



**PSA 21**  
**County of Riverside Office on Aging**

**MONITORING REPORT**

**April 27-30, 2009**



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The onsite assessment of the County of Riverside Office on Aging (OOA) was conducted by CDA staff from April 27-30, 2009. The following were present:

Don Braeger, Policy Manager, Geri Baucom, Coach, Fiscal and Monitoring Protocol Team; and Program Specialists, Eura Trent, Donna DiMinico (Administrative); Anthony Perez, (Fiscal); Barbara Estrada, R.D., (Title III C Elderly Nutrition Program and Title III D Disease Prevention and Health Promotion); and Phillip Carr (Title V).

As part of this review the following CDA staff conducted a separate onsite visit from March 23-26, 2009, Joel Weeden (Title III E Family Caregiver Support Program); and Kathleen Hendrickson (Alzheimer's Day Care Resource Center, Linkages, Title III B Supportive Services, Information and Assistance and Disaster Preparedness).

Throughout the monitoring report, either County of Riverside Office on Aging (OOA) or Area Agency on Aging (AAA) is used to refer to the County of Riverside Office on Aging. In every instance, the two terms are synonymous. CDA staff monitored administrative, fiscal, and specific program standards required by the Older Americans Act (OAA) and Older Californians Act (OCA).

This report includes:

- Recap of the standards monitored during the visit.
- Recognition of best practices or models of service delivery discovered during the monitoring visit that will be shared with the aging network by a notice posted on CDA's website.
- Findings and required actions to be taken by the County of Riverside OOA to correct specific findings associated with the monitoring visit.
- Corrective Action Plan to be completed by County of Riverside OOA and submitted to CDA.

## **RECAP/OVERVIEW OF MONITORING VISIT**

This section provides a recap of the standards reviewed the monitoring visit and the recognition of the AAA staff that assisted CDA to accomplish its work.

### **AAA Administrative Review**

#### **Governing Board**

Geri Baucom, Eura Trent, and Donna DiMinico, met with Opal Hellweg, Legislative Team Member to Board of Supervisor, Jeff Stone, to determine if the Governing Board, as the policy-making body of the AAA, recognizes and fulfills its roles and responsibilities as required by all regulations, laws, and contracts. The Riverside County Board of Supervisors (BOS) is the grantee for Planning and Service Area (PSA) 21. The BOS is responsible for reviewing and approving the Standard Agreements with CDA, Service Provider contracts, the Area Plan and annual updates, and the Year-End reports. The BOS conducts weekly meetings which are televised simultaneously. Ms. Hellweg is the liaison for placing senior-related issues from constituents or OOA staff on the agenda. In addition, Supervisor, Stone's District Office is located at the Kay Cenicerros Senior Center in Menifee. The BOS continues their high level of support to the, OOA. During this monitoring cycle the AAA produced a DVD, "Aging in America", that Supervisor, Roy Wilson, then chair of the BOS, supports the OOA and its work. The BOS and the Advisory Council have a close and supportive working relationship to address AAA issues.

#### **Advisory Council**

Eura Trent and Donna DiMinico met with Lynette Worrell, Program Specialist II, and Geri Baucom and Eura Trent conducted a telephone conference call with Doris Morgan-Richards, Advisory Council Chair, to determine if the Advisory Council is provided the opportunity to; 1) advise the AAA on all matters related to the development and administration of the Area Plan and all operations conducted under the plan; and 2) further the AAA's mission of developing a community-based system of care for older persons living within the PSA. The Advisory Council is made up of 17 council members, 5 are appointed by the BOS, and the remaining 12 are selected through an application process. Currently there are no vacancies. The Advisory Council has 5 standing committees: Housing, Transportation, Health, Intergeneration, and Alzheimer's Day Care Resource Center (ADCRC). The Advisory Council is involved in the Needs Assessment process, Area Plan Development, and Public Hearings. The bylaws are reviewed annually by the BOS for approval and were last updated in 2005. Every two years the Advisory Council receives regular training on ethics and the Brown Act. In 2008, the Advisory Council participated in its own Lesbian, Gay, Bisexual, and Transgender (LGBT) sensitivity trainings conducted by Patrick Arbore from the Goldman Institute. The AAA staff reports to the Advisory Council at each meeting and have a beneficial working relationship.

### **Staffing and Organization**

Eura Trent and Donna DiMinico met with Terrill Riley, Senior Accountant, and Lisa Starcev, Human Resources Coordinator, to determine if the AAA has an adequate number of trained staff to administer programs to older individuals living within the PSA. Ms. Trent and Ms. DiMinico reviewed duty statements, a desk manual, and the Personnel Procedures manual which was updated three years ago. The AAA utilizes County and external training resources to enhance job-specific skills of AAA staff. It was determined that personnel practices and procedures have been established and are well maintained.

### **Procurement/Contract Process**

Eura Trent and Donna DiMinico met with Jeanette Flores, Contract Services Officer, to determine if the AAA had established systematic procedures for the award and administration of contracts through an open and competitive process. All documentation for this standard was reviewed. The latest Request for Proposal (RFP) was issued in April 2009. The OOA continues to submit one contract to the Governing Board for all service provider contracts. All contracts have been executed in a timely manner.

### **Area Plan Achievement**

Eura Trent and Donna DiMinico met with Linda Swanson, Program Specialist II, to determine if the AAA has a process for monitoring and tracking the progress of goals and objectives in the current approved Area Plan. The OOA, the Advisory Council, and local community representatives work together throughout the year to monitor and revise specific goals and objectives as necessary. This Area Plan promotes coordination and advocacy to enhance service delivery for the benefit of older adults and persons with disabilities in the community. Area Plan updates are submitted to CDA in a timely manner.

### **Targeting**

Eura Trent and Donna DiMinico met with Linda Swanson, Program Specialist II, to ensure the AAA conducts a needs assessment once every four years and targets older individuals with the greatest economic or social needs with particular attention to low-income, minority individuals who live within the PSA. Currently the OOA uses County census data and is moving toward geographical mapping (zip code tracking system) to identify and target the senior population in the PSA. The OOA promotes outreach services to targeted populations through the InfoVan, community forums, and involvement in public events.

The OOA conducted a key informant survey that uncovered three new service needs: finance, long-term care, and socialization. OOA convened eight focus groups to identify the needs of specific populations with emphasis on the Hispanic, LGBT, Baby Boomer, and rural County residents. The OOA utilized Survey Monkey to evaluate the long-term care needs of Baby Boomers. An LGBT focus group led the OOA in supporting LGBT social needs by participating in community events such as the Pride Event in Palm Springs.

### **Community-Based Services**

Eura Trent and Donna DiMinico met with Linda Swanson, Program Specialist II, to ensure the OOA proactively provides leadership in the development of a comprehensive and coordinated community-based system of services within the PSA. The OOA demonstrates leadership in the development of partnerships with community organizations, such as Independent Living Program (ILP). The OOA plans to build more formal partnerships through the execution of Memoranda of Understanding agreements.

Senior centers are designated by OOA as Community Focal Points. OOA staff and the Advisory Council plan to elevate the status of these focal points through the establishment of a new committee on the Advisory Council. These efforts provide more opportunity for collaboration between the County's programs and community service providers to ensure service coordination for seniors.

### **Management of Service Providers**

Eura Trent and Donna DiMinico met with Nghia Nguyen, Accountant II, to determine if the AAA effectively communicates with, disseminates policies to, and monitors its service providers. The OOA distributes information to its network of service providers through regular email communication and annual training. CDA staff reviewed the OOA monitoring schedule and service provider files. OOA staff conducts annual monitoring which includes a request for feedback from service providers. Monitoring reports included findings, recommendations, and timelines for corrective actions. The Contracts Department is responsible for ensuring the contracted service activity levels are met. OOA staff follows up with providers directly by telephone or letter as needed and maintain notes electronically.

### **Data Reporting**

Phil Carr met with Jeannette Flores to discuss information on data and reporting procedures. All data reporting was on time and without any errors. The AAA has processes in place that included all appropriate documentation. The AAA has a procedures binder for data reporting available for staff use.

### **AAA Fiscal Review**

Anthony Perez met with Ricardo Hinestroza, Fiscal Officer/Senior Accountant, Terill Riley, Senior Accountant, Mark Dunlap, Title V Program Manager, Jeanette Flores, Contracts Manager, Nghia Nguyen, Accountant II, and Yvonne Palembas, Accountant I, to determine if the AAA maintains a financial reporting system that reflects accurate, current, and complete disclosure of the financial activities of the AAA and its service providers. Mr. Perez reviewed each standard of the CDA Fiscal Review tool, examined the service provider contract language for fiscal requirements and assessed fiscal monitoring reports prepared by the AAA. AAA fiscal staff uses OSSIS, the County's web-based ORACLE Database Financial Accounting System, PeopleSoft Software for employee timesheet data, and Excel spreadsheets to track expenditures and revenues reported to CDA. Mr. Perez reviewed several reported expenditures for February 2009 and traced them back to the originating invoice. The AAA maintains proper and adequate documentation.

## **Specific Program Reports—Older Americans Act Programs**

### **Title III B—Supportive Services (General)**

Title IIIB Supportive Services were monitored by Kathleen Hendrickson. The AAA provided the Title IIIB Supportive Services Monitoring Tool which was reviewed prior to the monitoring visit by Denny Wight, CDA Analyst for Title IIIB Services, and Kathleen Hendrickson. Ms. Hendrickson also reviewed the Title IIIB Case Management Tool completed by the AAA.

During the monitoring visit Ms. Hendrickson reviewed contracts and monitoring process for Title IIIB Supportive Services. The AAA contracts for the following Title IIIB services: Personal Care, Homemaker, Chore, Assisted Transportation, Adult Day Care, and Legal Assistance. Outreach, Case Management and Public Information are provided directly by the AAA. Community Services/Senior Center Management is provided directly and by contract.

Ms. Hendrickson reviewed the following contracts: Colorado River Senior Community Center/Senior Center Staffing; Independent Living Partnership/Assisted Transportation; Family Service Association of Western River County/Adult Day Care; Second Harvest Food Bank/Senior Center Management; Developing Aging Solutions with Heart, Inc. (DASH)/Adult Day Care; and Maxim Health Care/Personal Care and Homemaker.

All contracted programs were monitored with the Integrated Monitoring Assessment form and was completed in a timely manner.

Ms. Hendrickson reviewed the voluntary contribution letter used for the Title IIIB programs. The language used in the letter indicated that a donation was not required to receive services.

### **Title III B—Information and Assistance (I&A)**

Title IIIB I&A services are provided directly by the AAA through the HelpLink Information and Assistance staff. HelpLink staff also provides services through the Info Vans throughout the county. The AAA provided CDA staff with the Information and Assistance Program Tool prior to the monitoring visit. The tool was reviewed by Scott Crackel, Analyst for Title IIIB I&A/Disaster Preparation, and Kathleen Hendrickson.

During the monitoring visit, Kathleen Hendrickson reviewed the I&A tool with Renee Dar-Khan, Social Services Supervisor for the I & A program. Ms. Dar-Khan also provided an instructional review of the computerized intake program which includes on-line resource directories.

Ms. Hendrickson reviewed documents associated with the I & A program including the HelpLink Team Handbook which includes training materials and disaster preparation information.

## **Disaster Preparedness**

Ms. Hendrickson reviewed the HelpLink Team Handbook which includes the CDA Disaster handbook and the Riverside County OOA Disasters and Emergency Policies and Procedures. All I & A staff have access to this binder. In addition the AAA also makes available to its clients The Hartford "*It Could Happen to Me*" Family Conversations about Disaster Planning booklet.

## **Title III C—Elderly Nutrition Program (ENP)**

An assessment of the ENP was conducted with Merrill King, R.D., and Jeanette Flores, Contracts and Services Officer. CDA staff, Barbara Estrada, R.D., used the CDA ENP monitoring tool to review the donation procedures and request signs, current ENP menu compliance with Dietary Reference Intakes (DRI), Home-Delivered Meals (HDM) policies and procedures, annual monitoring reports, corrective action plans, eligibility assessments, contracts, quarterly staff training, training evaluations, and nutrition education topics.

Ms. Estrada conducted site monitoring of three ENP service providers. The meal programs monitored provided a representative sample of contracted services from both Sodexo Senior Services and Family Service Association.

Ms. Estrada met with Shannon Frye, Administrative Assistant, and Alfredo Toribio, General Manager for Sodexo Senior Nutrition Services, at the production kitchen at the University of California Riverside Extension. The site monitoring visit included an appraisal of eligibility assessments, a review of the current menus, training and nutrition education records.

Ms. Estrada and Ms. Flores visited two Sodexo congregate dining sites, the Murrieta Senior Center and the Mary Phillips Senior Center in Temecula. At each dining site a review of the kitchen was conducted along with meal service procedures, donation procedures and conversations with program participants.

Ms. Estrada and Mr. King met with Dave Renno, Director of Family Service Association, and conducted an on-site visit at the Kay Cenicerros Community Center. The visit included a review of the kitchen, the meal service procedures, donation procedures and conversations with the program participants.

## **Title III D—Disease Prevention and Health Promotion**

An assessment of the Title III D Disease Prevention and Health Promotion program was conducted with Fran Ferguson. Ms. Estrada reviewed the CDA monitoring tool with Ms. Ferguson.

The Title III D program provides two major initiatives; both are provided as a direct service of the AAA. The Fit After Fifty program is an exercise program to promote strength and mobility. The SMART card program is used to promote medication awareness.



### **Title III E—Family Caregiver Support Program (FCSP)**

The AAA's unique strategy to meet OAA expectations for the Family Caregiver Support Program (FCSP) is one of the most comprehensive in the state, and is under continuous improvement in order to maximize its effectiveness and address evolving community needs. The success of its direct and contracted FCSP systems of support is directly related to having all of the AAA systems in sync – community input, planning, provider networking, contractor oversight, and ongoing program evaluation. These finely tuned operations made it very easy to conduct an in-depth FCSP review, that covered planning and budgeting, procurement procedures, public information resources, service delivery procedures, and performance data. Time did not permit a review of the AAA monitoring process for FCSP contractors.

Staff leaders throughout the AAA were extremely helpful during the review process. Renee Dar-Khan, Social Service Supervisor, was very supportive in Mr. Weeden's exploration of the Helplink Information and Assistance System and the work provided by an impressive in-house team of FCSP staff members – Mary Hrinko, Connie Gill, and Karen Carbajal. The AAA maintains an extensive array of FCSP resource information, which can be a challenge for Ms. Dar-Khan and her staff to keep both current and not overwhelming for potential consumers. Program Supervisor Fran Ferguson offered concise service and data records for the FCSP InfoVan. Senior Programs Deputy Director Michelle Hunter and Mental Health Service Supervisor Vicki Neugebauer patiently responded to numerous inquiries over the AAA's cross-cutting systems approach to delivering direct FCSP services. An excellent discussion was held with Administration Deputy Director Hilary Clarke over the importance of having procedures in place for prorating costs when FCSP services are meshed with other program funding sources, thereby ensuring each program pays its share of costs in accordance with the benefits received. Finally, Contract Services Officer Jeanette Flores helped numerous times with the documents review, and Aging Resource Specialist John Wirser provided insight on the Aging and Disability Resource Connection Program's role in helping FCSP clients.

FCSP provider visits were conducted with the two direct and two contracted FCSP providers. They allowed Mr. Weeden an opportunity to observe the caregiver support delivery systems that have evolved under the AAA's leadership, and furthered an understanding of the AAA's compliance with OAA expectations, services procurement procedures, and sub-contractor oversight responsibilities. In return, these service providers had the opportunity to seek clarification on FCSP-related procedures and highlight their best practices. Productive discussions were held with the following:

- Karen Carbajal, Social Services Worker III, FCSP Riverside County Office on Aging;
- Valerie Wheat, Program Specialist II, Grandparents Raising Grandchildren Program, Riverside County Office on Aging;

- Kay Perryman, Program Director, Daybreak Adult Day Services Family Service Association of Western Riverside County;
- Jeanne Klingenger, Executive Director, Care Connexus Adult Day Services.

### **Title V—Senior Community Services Employment Program (SCSEP)**

Phil Carr Spoke with Mark Dunlap the Project Manger for the SCSEP, Mary Mills (in charge of SPARQ), two participants, and two supervisors. Riverside County had five corrective actions that were reviewed. Four corrective actions were resolved and one remains. The fourth corrective action involving the National Indian Council on Aging, Inc. and SER-Jobs for Progress National had been deleted due to an error at the time of monitoring. The final corrective action that remains involves a contract with the Local Workforce Investment Board (LWIB). The LWIB contract will be renegotiated in June.

### **Specific Program Reports—Older Californians Act Programs**

#### **Linkages**

The AAA contracts with three agencies to provide ADCRC services: Care Connexus in Riverside, Family Service Association/Day Break Adult Day Services in Hemet, and Eisenhower Five Star Club in Palm Desert. The ADCRC contract and monitoring was reviewed by Kathleen Hendrickson.

Ms. Hendrickson was accompanied by Joel Weeden and Nghia Nguyen, Accountant II, on a site visit to Care Connexus. Jeanne Klingenger, Executive Director of Care Connexus conducted a tour of the center and answered questions about the operation of the center and ADCRC services. Care Connexus is a large center with several rooms that enables the staff to conduct services to several groups simultaneously.

Ms. Hendrickson and Joel Weeden were accompanied by Vikki Neugebauer, Program Manager on a site visit to Day Break Adult Day Services. Kay Perryman, Program Director of Day Break Adult Day Services, also conducted a tour of her center and answered questions. Day Break is a small center with one large room. Although they are a small center they provide a vital service to a rural area of Riverside County.

All of the ADCRC sites have been monitored in the last year; however, the ADCRC Core Elements Tool was not used to monitor the program.

Kathleen Hendrickson monitored the direct Linkages program by reviewing the Self Assessment tool completed by Cathy Andre, Services Supervisor II, and reviewing three client charts using the Chart Review tool. Ms. Andre is responsible for supervising three full-time care managers.

In a review of the charts, it was found the care managers addressed all the needs of the clients. Documentation in the charts indicated that care managers had frequent contact with all of their clients and provided excellent follow-up for the problems identified in the

care plan. Activities associated with care management were thoroughly documented in the charts indicating the excellent services provided by Ms. Andre and her staff.

## **BEST PRACTICES/MODELS OF SERVICE DELIVERY**

Best practices or Models of Service Delivery discovered during the monitoring of AAA are being identified by CDA to share with the aging network and other agencies or individuals interested in developing senior services in their community.

Listed below are either Best Practices or Models of Service Delivery identified during the monitoring visit conducted by CDA and discussed at the Exit Conference. Best Practices or Models of Service Delivery along with the AAA staff you select to provide guidance to individuals seeking information on specific activities, programs, and services, will be placed on CDA's website.

### **AAA Administrative Review**

#### **Advisory Council Handbook**

The AAA has developed a binder for each Advisory Council member which includes current and historical information on the Advisory Council and the Board of Supervisors; detailed contact information; bylaws; legislative, legal and ethical resources, including Brown Act compliance requirements; and training materials. The binder is portable, organized, and updated regularly for its utility.

### **Title III D—Disease Prevention and Health Promotion**

#### **Fit After Fifty**

This exercise program designed to increase strength and mobility provides 22 classes 2 times a week to 287 participants. The AAA leverages a considerable amount of services for a small amount of funding by using the train the trainer technique. Betty Robinson, Program Manager assures fidelity to the program design through routine monitoring.

### **Title III E—Family Caregiver Support Program (FCSP)**

#### **Senior Services Delivery the First Link with Caregivers**

Care Connexus Adult Day Services in Riverside is a well-established and respected provider of support for frail elders. The agency recognizes that they are often the first point of contact for family caregivers inquiring about services for the care receiver. Since a home visit is made for all adult day care applicants, this provides an opportunity for social work staff to observe how the "caregiver" is managing and offering guidance to them on FCSP support services.

#### **Survey of Grandparents Raising Grandchildren**

The OOA, in collaboration with the University of California Cooperative Extension, has developed a four-page questionnaire and successfully implemented a survey that provided grandparents with kinship care responsibilities on opportunity to voice their concerns over the types of needed support.

A December 2008 findings report has helped significantly in the planning efforts of the AAA Grandparents Raising Grandchildren Task Force.

### **Web-based Caregivers Resource Library**

Under the Caregivers Library tab, the OOA website links consumers to some of the most extensive national resource listings that exist today for caregivers. The National Caregivers Library is organized around 19 categories, which then drill down to numerous sub-categories that will offer popular articles, reports, and tools that a caregiver can use to both enhance the caregiving role and reduce the strains caused by it.

### **Title V—Senior Community Service Employment Program (SCSEP)**

#### **OOA SCSEP Database**

The AAA has an in-house database that is used to manage and track SCSEP activities in a timely manner. This database tracks when participant program activities need to be conducted, which includes Individual Employment Plans (IEP); recertifications; supervisor evaluations; and participant evaluations.

## **FINDINGS REQUIRING CORRECTIVE ACTION**

Included below is a formal description of findings that led to the corrective actions detailed in the Report of Required Corrective Actions (see attached) presented at the Exit Conference conducted by CDA on April 30, 2009. For your convenience, specific corrective actions to be taken by the AAA to address each finding are summarized in a Corrective Action Plan (CAP) format that is included as part of this report. The CAP will be transmitted electronically to the AAA to ease completion and submission to CDA.

### **Administrative Review**

#### **Advisory Council**

Article III Section A(2) of the Advisory Council bylaws states that members should reflect the geographic, racial, economic, and social complexion of the planning and service area they represent. The number of minority Hispanic older individuals on the Advisory Council is not representative of the proportion of minority individuals in the PSA.

- **Corrective Action:** Recruit Advisory Council members in proportion to the PSA's ethnic composition with particular emphasis on recruiting Hispanic individuals.

#### **Procurement/Contract Process**

California Code of Regulations (CCR) Section 7354(b)(8) requires a statement of minimum numbers of units of service to be provided and the definition of those unit measurements. Upon review, the Request for Proposal (RFP) documents did not include this statement or definition.

- **Corrective Action:** Ensure the RFP specifies minimum service unit performance expectations for each service category addressed in the procurement notification.

### **AAA Fiscal Review**

#### **Financial Reporting**

20 Code of Federal Regulations (CFR) Part 641.535 (b) Fringe Benefits, excludes retirement and unemployment compensation costs for participants. Both Retirement and Unemployment Insurance benefits were paid to participants of the SCSEP (Title V) program during FY 2008-09 in accordance with the County's Project/Grant Summary records, year-to-date through February 2009. Expenses labeled as Retirement Debt Srvs – Misc., Retirement – Misc. Temp and Unemployment Insurance were paid to participants as budgeted in the summary records. Federal law prohibits participants in a training program from receiving similar benefits equally paid to regular staff. The benefits were reported as expended and paid by CDA as reimbursements pursuant to the contract with CDA.

- **Corrective Action:** Submit a year-to-date adjustment with the next Title V Monthly Expenditure Report and Request for Funds (CDA 29) to remove any retirement, pension benefits in lieu of Social Security, and/or unemployment insurance costs charged to the federal program.

### **Budget Control**

45 CFR Part 92.20(b)(1), requires Area Agencies to establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of financial activities of the Area Agency and its providers. Estimates used by AAA staff in lieu of service provider budgeted amounts were used to report funding for each service provided in budget revision #1. These estimates were based on Closeout data prior to the submittal of the budget revision. Amounts included in the service provider budgets for Program Income regarding the Congregate and Home Delivered Meal programs did not agree with the budgeted amounts included in this revision for the Area Plan Budget (CDA 122). (This is a repeat finding from November 2006)

- **Corrective Action:** Ensure information submitted on service provider budgets is used to develop the Area Plan Budget (CDA 122) and subsequent budget revisions submitted to CDA.

45 CFR Part 92.20(b)(1), requires AAA to establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of financial activities of the AAA and its providers. Staff annual wage rates on the personnel pages of both the Area Plan (CDA 122) and HICAP (CDA 229) Budget revisions were not the same for similar staff listed in the budgets submitted to CDA. When annual rates change they may exceed the total funds paid to staff and may exceed totals shown on the Organization Chart resulting in inaccurate paid positions.

- **Corrective Action:** Use consistent annual wage rates for AAA staff on the Personnel pages of the Area Plan Budget (CDA 122), HICAP Budget (CDA 229), and Title V Budget (CDA 30) submitted to CDA.

45 CFR Part 92.20(b)(1), requires AAA to establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of financial activities of the Area Agency and its providers. The contract with service providers includes a detailed line item budget consisting of contracted (federal) funds, Match Cash and Match In-Kind, for each service provided. Any service funded by provider sources that go beyond these categories could be defined as Non-Match Cash, Non-Match In-kind, and Indirect Costs. Therefore, service providers should be given the opportunity to report these additional funding categories as separate streams for each service provided.

- **Corrective Action:** Revise the service provider budget forms to include a place to budget Non-Match Cash, Non-Match In-kind, and Indirect Costs.

45 CFR, Part 92.20(b)(1) requires AAA to establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of financial activities of the AAA and its service providers. The Personnel Pages of the revised FY 2008/09 Area Plan Budget (CDA 122) were compared to the AAA Organizational Chart. The percentage of time and funding source on the personnel pages of the budget were not reflective of the costs of salaries by funding source.

- **Corrective Action:** Ensure the Personnel pages of the Area Plan Budget (CDA 122) include all costs for salaries regardless of funding source.

45 CFR, Part 92.20(b)(1) require AAA to establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of financial activities of the AAA and its service providers. The Personnel pages of the revised FY 2008/09 Area Plan Budget were compared to the AAA Organizational Chart. The chart reflected a percentage of time for Local Match to all full-time equivalents (FTE) and funding sources which did not convey each position or FTE actual time worked in the budget. Each FTE should be accounted for by using a time base of 100% or less by program category by funding source.

- **Corrective Action:** Ensure the percentages of FTE on the organization chart agree with the Personnel pages of the Area Plan Budget (CDA 122), HICAP Budget (CDA 229), and Title V Budget (CDA 30).

### **Specific Program Reports—Older Americans Act Programs**

#### **Title III B—Information and Assistance (I&A)**

The I&A Monitoring Tool indicated that the percentage of follow-ups for I & A calls for FY 2007-08 was 46 percent. After reviewing documentation with Ms. Dar-Khan the actual percentage for follow-up for FY 2007-08 was 70 percent. CCR Section 7537 requires I&A service providers to follow-up on each referral to ascertain if the older individual's service needs were met.

- **Corrective Action:** Develop and implement a standardized procedure to ensure completion of follow-ups and documentation of outcomes for each client that is referred to a needed service, within 30 days of the referral, to ascertain if the individual's service needs were met.

#### **Title III C—Elderly Nutrition Program (ENP)**

The California Retail Food Code (CRFC) requires all meals that are held away from temperature control for four hours to be discarded. The general rule for safe food holding of ENP meals is a two hour holding time along with maintaining the temperature of the meal in the safe zone (over 135°). Each County Environmental Health Office may interpret the regulation differently. The CDA advises the OOA to contact their local agency and develop policy and procedure for home-delivered meals that would meet the requirements of their local Environmental Health Office.



- **Corrective Action:** Ensure all Home-Delivered Meal route delivery times comply with California Retail Food Code (CRFC) requirements.

CCR Section 7638.3(a) (4) requires assessment of need to be determined quarterly. Such reassessment shall be done in the home of the participant at least every other quarter. A random review of client files at the Sodexo UCR Extension site found that many files did not include completed quarterly reassessments. Sodexo staff has recently developed a system to maintain files for the clients. But a majority of the clients have not been assessed. The quarterly assessment client files did not have the signature of the assessor or date the assessment was completed.

The assessments should include:

- questions used to establish eligibility,
- signature of the person who performed the assessment,
- date the assessment was performed, and
- assessments should be completed on a quarterly basis.

CDA has allowed flexibility in the area of quarterly assessments. Quarterly assessments can be completed by the meal delivery drivers. If this system is used, the sheet should be signed by the driver and dated, and it should include the reason the client is eligible for the program. A check list format is sufficient to establish eligibility. The drivers could complete a few of the quarterly assessments each day in order to avoid delaying meal delivery. Additional training should be provided for the drivers to acquaint them with what to look for to assure participants are managing independently on a daily basis, or to determine if a client needs assistance from other senior service providers. Ms. Estrada demonstrated how to find examples of training tools on the CDA website for both Ms. Frye and Mr. Toribio.

- **Corrective Action:** Verify all Sodexo home-delivered meal participants are assessed for program eligibility on a quarterly basis.
- **Corrective Action:** Ensure each quarterly assessment form is signed and dated by the person who performed the assessment.

CCR Section 7636.5 (e) requires training sessions to be evaluated by those receiving the training and (f) documentation of training including evaluation and attendance records shall be maintained.

Sodexo is developing a system to maintain records of training in binders but did not include an evaluation. A sample evaluation is on the CDA website and may be used or changed to suit the training offered.

- **Corrective Action:** Ensure Sodexo Senior Services provides staff and volunteers an opportunity to evaluate training sessions and maintains documentation of the evaluation.

Older Americans Act Section 315(b) (4) (B) requires each area agency clearly inform each recipient that there is no obligation to contribute and that the contribution is purely voluntary. The donation signs at each congregate dining center did not include this language.

- **Corrective Action:** Ensure all requests for donations include language clearly informing each participant there is no obligation to contribute; the contribution is purely voluntary; and services will not be denied to individual who do not contribute to the cost of the meals.

Correct accounting procedures were not followed at Sodexo Senior Services. Two people are required to count the donations that are received from the nutrition sites to assure that there is no theft and that the count is verified by both.

- **Corrective Action:** Ensure Sodexo Senior Services follows good business practices by having two individuals count the collected donations.

The CRFC Section 114157 requires a thermometer to be provided for each refrigeration unit, located to indicate the air temperature in the warmest part of the unit. One of the non-commercial refrigeration units at the Murrieta congregate meal site did not contain a thermometer.

- **Corrective Action:** Ensure all refrigerators at Sodexo Senior Services meal sites have a thermometer and refrigerator temperatures are logged daily.

CCR Section 7250 (a)(3)(C)(4) requires written procedures for carrying out all of the responsibilities and requirements under the federal law and state regulations. The AAA did not have an up-to-date Policy and Procedure manual for the nutrition programs.

- **Corrective Action:** Ensure the AAA has a current policies and procedures manual for the Elderly Nutrition Program.

CCR Section 7638.11 (a) requires Nutrition Education to be provided a minimum of four times per year to participants in congregate and home-delivered meal programs. Nutrition Education has not been presented to all sites.

- **Corrective Action:** Verify and document that Nutrition Education activities are conducted at each nutrition site.

National Aging Programs Information Systems (NAPIS) requires Nutrition Education to be counted in units of one session per participant. For example, if there were 50 people attending a congregate Nutrition Education session, this would be counted as 50 sessions, not as one session. The numbers of Nutrition Education units that the AAA has reported to the CDA this year (19) demonstrate that the Nutrition Education is not being counted according to the NAPIS requirement.

- **Corrective Action:** Ensure Nutrition Education is counted as one session per participant.

### **Title III E—Family Caregiver Support Program (FCSP)**

OAA Section 373(g)(2) requires that the annual federal share of funds for FCSP shall not exceed 75 percent of the total FCSP support service costs. This non-federal 25 percent match responsibility - to be provided through State and local sources - was passed by the State to the local services network. CDA's Standard Agreement, Exhibit B, Article I, (H) provides guidance on the OMB Circular A-133 expectations for what may be considered an eligible matching contribution. In accordance with sentences 2 and 3 of this paragraph, these contributions must benefit a contract-supported program (e.g., services for FCSP-eligible clients), come from non-federal third parties, and count towards satisfying a federal award matching requirement only where the payments would be otherwise allowable costs if the party (e.g., FCSP service provider) receiving the contributions were to pay for the costs with Title III E funds. For FY 2008-09, the AAA budgeted \$398,212 in cash match for a federal share of \$5,000 in direct Respite Care for adults caring for a frail elder. In this same federal service category for FY 2007-08, the AAA Closeout Budget reported \$451,465 in direct cash match expenditures; again correlated with a very small federal share of \$7,409 in expenditures. The FY 2006-07 Closeout Budget had a direct Respite Care cash match of \$271,490 and only \$3,082 in Title III E expenses. After much discussion, AAA staff determined these significant cash match amounts represented California Children and Families Act (First 5) funding. However, according to Riverside County Children and Families Commission, the AAA uses these State funds to provide "full-time and respite subsidized child care slots to low-income grandparents/caregivers caring for children 0-5, as well as family assessment, referrals and follow-up services as needed." Therefore, these funds do not meet OAA match requirements.

- **Corrective Action:** Discontinue budgeting and reporting expenditures of FCSP-ineligible matching funds in order to meet non-federal share match requirements.

OAA Sections 372(b)(1) and 373(c)(2) specify that when serving FCSP eligible caregivers of older adults, priority shall be given to: (a) caregivers providing care to individuals age 60 or older with a cognitive impairment, and (b) caregivers age 60 or older having the greatest social and economic needs. These OAA service priorities help meet the intent of having FCSP respond quickly and effectively to prevent potential collapse of a fragile caregiver support arrangement, thereby preventing institutional placement and the potential spend down to Medi-Cal, as specified in the first objective of the U.S. Administration on Aging 2007-2012 Strategic Action Plan. The AAA's Helplink Information and Assistance serves as the intake and risk acuity screening unit for all inquiries to the AAA for help. Cases are then triaged to determine which AAA direct or contracted provider should address the caller's needs. Two Helplink caregiver case notes were reviewed (#109509 and #109630).

- In a call received on February 5, a son reported that his 83 year old father was at risk of caregiving burnout. The husband's wife was impaired by dementia and

severe arthritic knees, and he was facing treatment for cataracts. The son was informed that the in-house FCSP referral would be processed ASAP, and Helplink staff provided maximum acuity ratings for caregiver breakdown, injury/illness, and weak support system. However, the father received a letter dated February 18 that the "FCSP Program currently has a waiting list. You can anticipate a telephone call within 30 business days." The case was assigned to FCSP on March 18, and was still pending an initial contact by AAA staff as of March 24.

- In a call received on February 9, a stressed, young mother with two children reported she had no one to relieve her from providing care for her 90+ veteran grandfather with dementia and in poor health, whom she has cared for the last 10 years. She was having difficulty in getting the U.S. Veteran's Administration to help. She was informed by AAA Helplink staff that her "request for services will be processed today" and they assessed maximum acuity ratings for caregiver breakdown, injury/illness, and weak support system. However, the AAA processing of this case followed the same above timeline, and the family caregiver had still not received a call.

These AAA triage policies placed two fragile caregiver support systems at higher risk of collapse as a result of a six-week or more processing delay, which does not correlate with OAA expectations.

- **Corrective Action:** Ensure AAA policies and procedures associated with the delivery of the AAA's multifaceted FCSP systems do not unnecessarily delay the provision of caregiver support services and place caregivers on "waiting lists."

OAA Section 315(a) prohibits fees or cost sharing for services that receive OAA funds unless the State has established a cost-sharing policy plan. The State of California does not permit cost sharing for OAA-funded services and, therefore, has not implemented income-based sliding scale fee criteria for recipients of OAA services. In conducting a review of website information for two FCSP-contracted providers, information provided on services that are part of their FCSP systems of caregiver support included references to various types of fee arrangements. Inland Caregiver Resource Center receives both OAA and California Department of Mental Health (DMH) funding. It expends OAA funds in Caregiver Support Services and Respite Care, but then includes the following statements on its web pages: "the first session is conducted in the family caregiver's home free of charge," "a sliding fee scale is used to cover the costs of counseling," "To pay your registration fee for education and training," and "family caregivers may have a share of cost to help pay for the respite." Care Connexus is funded to provide FCSP Respite Care. However, when discussing respite care on its website, the provider mentions "some scholarship assistance is available for qualifying individuals." This could lead one to believe fees will be charged for those who may not meet income-related requirements. During the field visit at Family Service Association Daybreak Adult Day Services, the Program Director

mentioned that FCSP funds are used to reduce private pay fee arrangements (e.g., family pays for one day of service per week and provider uses Title III E funds to pay for a second day for the week. This is still a form of cost sharing). Confusion over eligibility and fee requirements may result from a provider not having any distinction made between OAA and other non-federal services in its public information materials.

- **Corrective Action:** Ensure fee generating policies used by AAA contracted organizations for the delivery of other non-OAA services are not applied to FCSP services provided at the same location.

OAA Section 315(b)(4) requires the AAA to ensure that each of its OAA-funded service organizations provide each client an opportunity to contribute to the cost of a service. When soliciting this contribution, the client must clearly be informed “that there is no obligation to contribute and that the contribution is purely voluntary.” This required qualifying statement associated with solicitations was not used by the following FCSP providers when requesting donations on their websites: Developing Aging Solutions with Heart, Inc. (DASH), Inland Caregiver Resource Center (except in one location under Education and Training), and Family Service Association of Western Riverside County.

- **Corrective Action:** Require service providers, when soliciting voluntary contributions, to inform all caregivers served through FCSP that these services will not be denied to anyone who does not contribute to the cost of the service.

OAA Section 372(e)(2) requires FCSP data and records shall be maintained in order to monitor compliance with federal eligibility and service priority requirements, and ensure performance accountability for expended Title III E and matching funds. This is particularly important for FCSP clients receiving support services provided within the three federal categories – Caregiver Support, Respite Care, and Supplemental Services – where Federal eligibility requirements become more stringent and service access is based on assessed need. CDA has allowed AAAs to guide their direct and contracted FCSP service providers in evolving adequate data tracking and accountability systems. During site visits, FCSP providers were asked to share their FCSP-related service records for a few caregiver clients. Both Family Service Association of Western Riverside County and Care Connexus did not maintain a client record for those caregivers receiving FCSP support. FCSP information was kept in various logs of day-to-day activity maintained by these day care service providers. Both offered a comprehensive array of caregiver support services, but it was unclear whether FCSP-funded activity was delivered in accordance with federal eligibility and requirements. Some FCSP documentation may have been available via review of day care attendee records, but possibly not for those FCSP-supported caregivers whose care receiver remained at home.

- **Corrective Action:** Ensure FCSP providers document the following in each FCSP registered client record:
  - i. Caregiver and care receiver profile/eligibility data;

- ii. Assessed need of caregiver for support services;
- iii. FCSP and other support services provided to meet the assessed caregiver needs;
- iv. Additional criteria met for FCSP Respite Care and Supplemental Services;
- v. Evidence of provision of all support services funded by both the Title III E federal share and matching funds; and
- vi. Follow-up on caregiver status, service effectiveness, and changing needs.

OAA Section 373(e)(2) requires that performance data is collected and maintained in order to evaluate and compare the effectiveness of services provided with FCSP funding. The AoA requires collection of profile information for both caregivers and their care receivers in order to meet National Aging Program Information System (NAPIS) reporting requirements. AoA has determined this information shall be provided for the “primary” family caregiver, who may be caring for one or more care receivers. The “grandparents” component of FCSP requires profile information on both the older relative caregiver and the child or children receiving care. This profile data is reported only for those FCSP-eligible caregivers receiving support services provided within three federal categories: Caregiver Support, Respite Care, and Supplemental Services. The AAA has been inconsistent in reporting this profile information. The FY 2005-06 Annual Profile Report provided information on 2,224 caregivers for only 444 care receivers, and no profile information on child care receivers for 1,172 grandparents. For FY 2006-07, caregiver/care receiver data seemed reasonable, but the AAA provided profile data on only two grandparents and, again, no child care receivers. The profile data dilemma for the “grandparents” component continued this past year, and there was a return to more “primary” family caregivers than care receivers. AAA staff reported that caregiver-**only** profile information is collected at the time of the Helplink Information and Assistance screening, which may be an underlying factor in this disconnection between caregiver and care receiver NAPIS profile data. In addition, the AAA reported FCSP expenditures in Supplemental Services over the past two years, but no performance data; and unusually high performance for Caregiver Outreach, which is defined in NAPIS as a one-on-on contact initiated by FCSP service providers to identify caregivers and encourage their use of services (33,338 contacts in FY 2007-08, 27,399 contacts in FY 2006-07, and 114,060 contacts in FY 2005-06).

- **Corrective Action:** Evaluate and resolve inconsistencies in FCSP annual performance data before submission to CDA.

#### **Title V—Senior Community Service Employment Program (SCSEP)**

OAA is currently providing retirement and/or pension benefits in lieu of Social Security as a fringe benefit for SCSEP participants. SCSEP funds cannot be used to pay for a retirement system or plan for participants per 20 CFR Part 641.565(b)(3). It is the intent of the program to provide useful, part-time training assignments for individuals who are not job ready and are low-income. Offering a retirement plan to participants is a disincentive to seek unsubsidized employment. The County must cease the practice of

pay retirement or pension benefits in lieu of Social Security. Since the County contributes to Social Security for its employees, it must start paying Social Security benefits for all SCSEP participants. Although CalPERS voted to eliminate these SCSEP positions from their system on July 6, 2009 and the Riverside County Board of Supervisors voted on February 26, 2009 to eliminate these SCSEP positions the retirement continued to be given until December 30, 2008.

Riverside County is currently providing Unemployment Insurance for their SCSEP participants. According to the Unemployment Code Section 634.5(B)(e)(2), it states that by an individual receiving work relief or work training as a part of an unemployment work relief or work training program assisted or financed in whole or in part by any of the following: (1) a federal agency or (2) An agency of a state or political subdivision thereof; is considered." "Notwithstanding any other provision of law, no provision excluding service from "employment" shall apply to any entity defined by Section 605 or to any profit organization described by Section 608, except as provided by this section.

- **Corrective Action:** Discontinue providing retirement, pension benefits in lieu of Social Security, and/or unemployment insurance as fringe benefits to SCSEP participants.

### **Specific Program Reports—Community-Based Services Programs**

#### **Alzheimer's Day Care Resource Center (ADCRC)**

The ADCRC programs were monitored during the last year by an AAA staff member using the AAA monitoring tool instead of the ADCRC Core Elements Tool. The required monitoring tool for the ADCRC program is the Core Elements Tool in the ADCRC manual. The requirement to use the Core Elements Tool was established by an agreement between CDA and the California Association of Area Agencies on Aging (C4A).

- **Corrective Action:** Ensure the ADCRC Core Elements monitoring tool is used to monitor the ADCRC program.